



**Todd & Weld**LLP

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March 3, 2021

**VIA ECF**

Honorable Loretta A. Preska  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

**Re: *Giuffre v. Dershowitz*, Case No.: 19-cv-03377-LAP**

Dear Judge Preska:

Pursuant to Rule 1.A of Your Honor's Individual Practices, Professor Alan Dershowitz ("Professor Dershowitz") respectfully requests leave to file under seal a letter renewing Professor Dershowitz's request that the Court compel non-party Leslie Wexner to submit to a deposition in this matter. As grounds therefore, Professor Dershowitz states that the letter references and attaches excerpts of the deposition of John Zeiger, Esq., which Mr. Zeiger has designated as confidential under the applicable protective order, ECF No. 168. Professor Dershowitz makes this request without prejudice to his right to later challenge the propriety of some or all of those confidentiality designations.

Respectfully submitted,

/s/ Howard M. Cooper  
Howard M. Cooper

cc: All counsel of record, via email